

CP:SLT  
F.# 2007R00229/OCDETF # NY-NYE-0534

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

I N D I C T M E N T

- against -

RICARDO MARIAN FANCHINI,  
also known as "Richard  
Rotmann," "Richard Fanchini,"  
"Riccardo Rotmann," "Riccardo  
Fanchini," "Riccardo Kozina,"  
"Richard Kozina," "Riccardo  
Wojoiechowska," "Jerzy Bank,"  
"Jeazy Bank," "Ioannis  
Skandalis-Themistoklis,"  
"Kozina Ryszaro," "Michael  
Prokupecz," "Aksamity,"  
"Yura," "Warhol," "Rysiek,"  
"Richard Ryjwirski," "Bank,"  
"the Polack," "the Gypsy"  
and "Vasja,"

Cr. No. \_\_\_\_\_  
(T. 21, U.S.C., §§ 853,  
959(c), 960(a)(1),  
960(a)(3), 960(b)(1)(A),  
960(b)(1)(B)(ii),  
960(b)(3) and 963; T. 18,  
U.S.C., §§ 982(a)(1),  
982(b)(1), 1956(h) and  
3551 et seq.)

Defendant.

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Import Cocaine, Heroin and MDMA)

1. In or about and between 1990 and September 27,  
2007, both dates being approximate and inclusive, within the  
Eastern District of New York and elsewhere, the defendant RICARDO  
MARIAN FANCHINI, also known as "Richard Rotmann," "Richard  
Fanchini," "Riccardo Rotmann," "Riccardo Fanchini," "Riccardo  
Kozina," "Richard Kozina," "Riccardo Wojoiechowska," "Jerzy  
Bank," "Jeazy Bank," "Ioannis Skandalis-Themistoklis," "Kozina  
Ryszaro," "Michael Prokupecz," "Aksamity," "Yura," "Warhol,"

"Rysiek," "Richard Ryjwirski," "Bank," "the Polack," "the Gypsy" and "Vasja," together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved: (a) five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, (b) one kilogram or more of a substance containing heroin, a Schedule I controlled substance, and (c) a substance containing MDMA, a Schedule I controlled substance, all in violation of Title 21, United States Code, Section 952(a).

(Title 21, United States Code, Sections 963, 960(a)(1), 960(b)(1)(A), 960(b)(1)(B)(ii) and 960(b)(3); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO  
(International Distribution Conspiracy)

2. In or about and between 1990 and September 27, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RICARDO MARIAN FANCHINI, also known as "Richard Rotmann," "Richard Fanchini," "Riccardo Rotmann," "Riccardo Fanchini," "Riccardo Kozina," "Richard Kozina," "Riccardo Wojoiechowska," "Jerzy Bank," "Jeazy Bank," "Ioannis Skandalis-Themistoklis," "Kozina Ryszaro," "Michael Prokupecz," "Aksamity," "Yura," "Warhol," "Rysiek," "Richard Ryjwirski," "Bank," "the Polack," "the Gypsy" and "Vasja," together with others, did knowingly and

intentionally conspire to distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, which offense involved: (a) five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, (b) one kilogram or more of a substance containing heroin, a Schedule I controlled substance, and (c) a substance containing MDMA, a Schedule I controlled substance, all in violation of Title 21, United States Code, Section 959(a).

(Title 21, United States Code, Sections 959(c), 960(a)(3), 960(b)(1)(A), 960(b)(1)(B)(ii), 960(b)(3) and 963; Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE

(Conspiracy to Launder Proceeds of Drug Trafficking)

3. In or about and between 1990 and September 27, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RICARDO MARIAN FANCHINI, also known as "Richard Rotmann," "Richard Fanchini," "Riccardo Rotmann," "Riccardo Fanchini," "Riccardo Kozina," "Richard Kozina," "Riccardo Wojoiechowska," "Jerzy Bank," "Jeazy Bank," "Ioannis Skandalis-Themistoklis," "Kozina Ryszaro," "Michael Prokupecz," "Aksamity," "Yura," "Warhol," "Rysiek," "Richard Ryjwirski," "Bank," "the Polack," "the Gypsy" and "Vasja," together with others, did knowingly and intentionally conspire to conduct financial transactions in and

affecting interstate and foreign commerce, to wit: the transportation, transmission and transfer of funds to and through companies and bank accounts, which in fact involved the proceeds of specified unlawful activity, to wit: narcotics trafficking, in violation of Title 21, United States Code, Section 963, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, (a) with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i), and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq..)

CRIMINAL FORFEITURE ALLEGATIONS AS TO COUNTS ONE AND TWO

4. The United States hereby gives notice to the defendant that, upon his conviction of the offenses charged in Counts One and Two, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offenses, to forfeit (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations,

and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

(Title 21, United States Code, Section 853)

CRIMINAL FORFEITURE ALLEGATIONS AS TO COUNT THREE

6. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Three, the government will seek forfeiture in accordance

with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offense to forfeit any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such offenses.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18,

United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1))

A TRUE BILL

*Paul Cope*

FOREPERSON

*Roslyn R. Mauskopf*  
ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



F.# 2007 R00229

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

CRIMINAL CASE  
INFORMATION SHEET

1. Title of Case: UNITED STATES v. RICARDO MARIN FANCHINI
2. Related Magistrate Docket Number(s): \_\_\_\_\_  
\_\_\_\_\_  
None (V)
3. Arrest Date: \_\_\_\_\_
4. Nature of Offense(s):  Felony  
 Misdemeanor
5. Related Cases--Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules).  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
6. Projected Length of Trial: Less than 6 weeks (X)  
More than 6 weeks ( )
7. County in which cause of action arose: KINGS  
(Pursuant to Rule 50.1(d) of the Local EDNY Division of Business Rules)
8. Has this indictment/information been ordered sealed? (X) Yes ( ) No
9. Have arrest warrants been ordered? (X) Yes ( ) No

UNITED STATES ATTORNEY

By: Steve Tiscione  
STEVE TISCIONE  
Assistant U.S. Attorney  
(718) 254-6317